



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

December 18, 2019

Certified Mail
Return Receipt Requested

Don Wiggins, Manager of Technical Services
Bluestone Coke, LLC
3500 35th Avenue North
Birmingham, Alabama 35207

RE: Final Approval of Corrective Measures Implementation Work Plans (including cost estimates)
SMA 4 - Former Chemical Plant
EPA ID Number: ALD 000 828 848
RCRA Docket Number: RCRA-04-2016-4250

Dear Mr. Wiggins:

The United States Environmental Protection Agency has completed its review of the September 7, 2018, Corrective Measures Implementation (CMI) Work Plan for the Former Chemical Plant.

SMA 4 - CMI Work Plan, Cost Estimate

The EPA's review found the September 7, 2018, CMI Work Plan to be acceptable. The Agency's review also found the September 16, 2019, revised cost estimate adequate for use in securing the initial corrective action Financial Assurance mechanism for SMA 4.

Recall that on July 27, 2018, the EPA issued an Interim Approval of the CMI Work Plan for SMA 4. The approval was interim (or conditional) because several tasks remained (see Table 1). Table 1 lists the outstanding tasks that had to be completed and their current status.

Table 1. Tasks to Complete CMI Work Plan for SMA 4

Task	Status
Provide a Quality Assurance Project Plan (QAPP)	Submitted August 30, 2018. EPA approved the QAPP on September 13, 2018.
Provide SMA 4 Sampling and Analysis Plan	Submitted September 28, 2018. EPA approved the plan on October 18, 2018.

EPA review of Cost Estimates Provide a Cost Estimate	EPA comments on the cost estimates issued on September 28, 2018. Revised cost estimates submitted October 29, 2018, and September 16, 2019.
	The Agency's review found the September 16, 2019, cost estimate adequate for use in securing the initial corrective action Financial Assurance mechanism.

With the satisfactory completions of the above tasks, the September 7, 2018, CMI Work Plan now has Final (unconditional) Approval.

SMA 4 - Financial Assurance Mechanism

Please submit the Financial Assurance mechanism covering both SMA 4 **within sixty (60) calendar days** from receipt of this letter. Please see Attachment C of 2016 RCRA Section 3008(h) Administrative Order on Consent for more detailed information on the financial assurance mechanism.

SMA 4 - Land Use Control Plan (LUCP)

With the Final Approval of the CMI Work Plan, please submit the LUCP **within one hundred and twenty (120) calendar days** from receipt of this letter.

SMA 5 – Former Pig Iron Foundry – LUCP

Although the LUCP for SMA 5 is due **within one hundred and twenty (120) days** from receipt of the July 11, 2019, approval of the CMI Work Plan for SMA 5, with the approval today of the CMI work plan for SMA 4, if desired, the LUCP for SMA 5 can be submitted in conjunction with the LUCP for SMA 4.

If you have any questions concerning this matter, please contact me at (404) 562-9629 or hardegree.wes@epa.gov.

Sincerely,



Wesley Hardegree, Project Manager
RCRA Corrective Action Section
RCRA Programs and Cleanup Branch

Cc: Corey Hendrix, EPA (via email)
Terry Rippstein, Terracon (via email)
Thomas Garrett, ADEM (via email)